

Counterfeit Fraudulent and Suspect Items (CSFI)

Business Policy

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Revision History					
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1	New Policy	Ian Williams 19.09.16			

APPENDICES

None

FORMS

None

1. Purpose

It is a flow down requirement from our key customers that Amari Copper Alloys and Amari Precision Tubes Limited demonstrate that we have a policy and plans in place that actively manage the risk of Counterfeit, Fraudulent & Suspect Items (CFSI) being deployed in the Supply Chain (SC). This policy recognises that throughout all levels of the Supply Chain (SC) there are parties who might wish to substitute Counterfeit, Fraudulent and Suspect Items (CFSI) for genuine items or services for commercial gain. All employees, partners and suppliers should be aware of the risks and hazards of CFSI entering the SC and understand their role in mitigating the risks.

2. Scope

This policy applies to all material, documents and records.

3. Definitions

3.1 Material:

Material refers to all raw material, components, documents and records associated with the deliverable product or service.

3.2 Counterfeit Material:

Material whose origin, age, composition, configuration, certification status or other characteristic (including whether or not the material has been used previously) has been falsely represented by:

- a) misleading marking of the material, labelling or packaging;
- b) misleading documentation; or
- c) any other means, including failure to disclose information;

except where it has been demonstrated that the misrepresentation was not the result of dishonesty by a supplier or sub-supplier within the supply chain.

3.3 Fraudulent Items:

Items that are intentionally misrepresented to be something they are not. Fraudulent items include items provided with incorrect identification or falsified/inaccurate certification.

3.4 Suspect Items:

A suspect item is one in which there is an indication by visual inspection, testing, or other information that it may not conform to established legislation, industry-accepted specifications or customer requirements. Suspect items must be further investigated to determine whether they are counterfeit. When an item contains indications, but insufficient evidence, of irregularities such as noncompliance with agreed-upon specifications in the manufacturing process, it may be declared suspect.

4. Policy

4.1 Roles and Responsibilities

4.1.1 Senior Management

Senior management shall ensure the policy for the avoidance of counterfeit material is available, communicated, understood and implemented by relevant staff at all levels within the organisation.

4.1.2 Management Representative

Amari Copper Alloys & Amari Precision Tubes shall appoint a quality representative who, irrespective of other responsibilities, has responsibility and authority within the organisation to:

- a) ensure that the arrangements required to manage the risk of counterfeit material in the supply chain are implemented and maintained.
- b) report to senior management any concerns regarding counterfeit material within the supplier organisation and supply chain.
- c) promote awareness of the risk of counterfeit material in the supply chain.
- d) ensure lessons learnt are communicated within Amari and the supply chain.

4.2 Competence, training and awareness

4.2.1 Amari Copper Alloys & Amari Precision Tubes shall determine the awareness level requirements appropriate to each functional role, the competence level required by each employee and how the training needs will be met.

4.2.2 Records of training, skills and competence are to be maintained.

4.3 Purchasing

4.3.1 Amari Copper Alloys & Amari Precision Tubes shall assess the risk of procuring counterfeit material. This shall take into account the criticality of the material in relation to performance and safety.

4.3.2 Where risk has been identified, Amari Copper Alloys & Amari Precision Tubes shall ensure that the requirements of this Standard, or an appropriate industry Sector Scheme or Standard is flowed down the supply chain.

4.3.3 As part of the evaluation of sub-suppliers, where final product integrity is considered important due to the critical nature of performance and safety, Amari Copper Alloys & Amari Precision Tubes shall be able to trace the source of supply of the material through the supply chain to the manufacturer to reduce the risk of counterfeit material in the supply chain.

4.3.4 Where Amari Copper Alloys & Amari Precision Tubes do not procure material directly from, or cannot trace the source of supply of the material through the supply chain to the manufacturer, this shall constitute an additional risk that Amari Copper Alloys & Amari Precision Tubes shall manage. As a minimum Amari Copper Alloys & Amari Precision Tubes shall demonstrate that the material will fulfil the acquirers specified requirements. The material characteristics and level of information shall not degrade the safety and performance of the deliverable material.

4.4 Test and Verification

4.4.1 Amari Copper Alloys & Amari Precision Tubes shall determine the rigour of inspection and test requirements for the acceptance of material. This shall be commensurate with the risk of the material being counterfeit and the criticality of the material in relation to safety and performance.

4.4.2 If material is suspected of being counterfeit at any point in production or service provision then additional testing shall be considered to confirm whether or not it is counterfeit material.



4.5 Control of Non-Conforming Material

4.5.1 Amari Copper Alloys & Amari Precision Tubes shall establish arrangements to:

- a) control suspected counterfeit material to prevent its unintended use or re-entry into the supply chain.
- b) ensure suspected counterfeit material is not returned to the sub-supplier unless under controlled circumstances for validation or testing.

4.6 Reporting of Counterfeit Material

4.6.1 Amari Copper Alloys & Amari Precision Tubes shall establish arrangements to ensure that occurrences of counterfeit material are reported to:

- a) the customer.
- b) the supplier of the material.
- c) the owner of the Intellectual Property Rights of the genuine material.
- d) National Law Enforcement Authorities i.e. Trading Standards Office.

4.7 Additional Requirements for Manufacturers

4.7.1 Amari Copper Alloys & Amari Precision Tubes and Suppliers who are original manufacturers shall consider measures to avoid the misrepresentation of their material by others. Such measures may include:

- a) the use of indelible, encrypted or covert marks on material, documentation and packaging.
- b) the secure destruction of substandard material, documentation and packaging.